

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE COBALT INTERNATIONAL  
ENERGY, INC. SECURITIES LITIGATION

Lead Case No. 4:14-cv-3428 (NFA)

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT BETWEEN PLAINTIFFS AND UNDEWRITER DEFENDANTS  
OTHER THAN GOLDMAN SACHS & CO. LLC AND FOR APPROVAL  
OF NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that Lead Plaintiffs and Class Representatives GAMCO Global Gold, Natural Resources & Income Trust and GAMCO Natural Resources, Gold & Income Trust, through their undersigned counsel, together with additional plaintiffs and Class Representatives (i) St. Lucie County Fire District Firefighters' Pension Trust Fund, (ii) Fire and Police Retiree Health Care Fund, San Antonio, (iii) Sjunde AP-Fonden, and (iv) Universal Investment Gesellschaft m.b.H. hereby respectfully move the Court, pursuant to Federal Rule of Civil Procedure 23(e) for an Order (i) granting preliminary approval of the proposed class action settlement on the terms set forth in the Stipulation and Agreement of Settlement Between Plaintiffs and Underwriter Defendants Other Than Goldman Sachs & Co. LLC (the "Stipulation"), dated November 28, 2018, (ii) certifying the proposed Settlement Class for settlement purposes, (iii) approving the form and manner of notice of proposed settlement to the Settlement Class; and (iv) approving the schedule for various deadlines in connection with the settlement.

Submitted herewith in support of this Unopposed Motion for Preliminary Approval are: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement Between Plaintiffs and Underwriter Defendants Other Than Goldman Sachs & Co. LLC and for Approval of Notice to the Settlement Class; and (ii) the Declaration of Andrew J. Entwistle in Support of Plaintiffs' Motion for Preliminary Approval of Settlement Between Plaintiffs and Underwriter Defendants Other Than Goldman Sachs & Co. LLC and for Approval of Notice to the Settlement Class, attaching the Stipulation and supporting exhibits.

Dated: November 28, 2018

Respectfully submitted,

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By: /s/Andrew J. Entwistle

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**CERTIFICATE OF SERVICE**

I certify that on November 28, 2018, the foregoing motion by Plaintiffs for preliminary approval of settlement and all supporting documents were filed with Clerk of the Court through the Court's ECF system, which will cause the document to be served upon all counsel of record.

/s/ Andrew J. Entwistle  
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